

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARY M. TARDIF,

Plaintiff,

-against-

CITY OF NEW YORK, NEW YORK CITY POLICE
DEPARTMENT, INSPECTOR JOHN O'CONNELL, DEPUTY
INSPECTOR EDWARD WINSKI, POLICE OFFICER JAMES
MCNAMARA, POLICE OFFICER ALENA AMINOVA,
POLICE OFFICER KENDAL CREER, POLICE OFFICER
MARSHA RUMBLE, POLICE OFFICER FELIX SCHMIDT,
DEPUTY INSPECTOR DANIEL MULLIGAN, SERGEANT
THOMAS MCMANUS, AND JOHN DOE NYPD OFFICERS
##1-9,

Defendants.

**DECLARATION OF
BRACHAH GOYKADOSH IN
SUPPORT OF DEFENDANTS'
MOTIONS *IN LIMINE***

13 Civ. 4056 (KMW)(KNF)

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BRACHAH GOYKADOSH, an attorney duly admitted to practice in the State of
New York and in this Court, declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,
that the following is true and correct:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter,
Corporation Counsel of the City of New York, attorney for defendants City of New York,
Sergeant McManus, Officer Schmidt, and Officer Rumble. As such, I am familiar with the facts
stated below. I submit this declaration to place on the record the relevant documents in support
of defendants' motions *in limine*.

1. Annexed hereto as Exhibit "A" are Plaintiff's Initial Disclosures
dated November 1, 2013.

2. Annexed hereto as Exhibit “B” are letters from Amy Robinson, Esq. to Stefan Krieger, Esq. dated January 23, 2015 and June 1, 2015.

3. Annexed hereto as Exhibit “C” are subpoenas for Tony Zilka (currently known as Mandy Quinn).

4. Annexed hereto as Exhibit “D” is a Supplemental Disclosure by plaintiff dated April 2, 2015.

5. Annexed hereto as Exhibit “E” are relevant excerpts from the declaration of plaintiff Mary Tardif.

6. Annexed hereto as Exhibit “F” are relevant excerpts from the 50-h hearing of plaintiff Mary Tardif.

7. Annexed hereto as Exhibit “G” are relevant excerpts from the deposition of defendant Police Officer Marsha Rumble.

8. Annexed hereto as Exhibit “H” are relevant excerpts from the deposition of non-party Police Officer Alena Aminova.

9. Annexed hereto as Exhibit “I” is a Supplemental Disclosure by plaintiff dated March 10, 2015.

Dated: New York, New York
January 16, 2018

ZACHARY W. CARTER
CORPORATION COUNSEL OF THE CITY OF NEW YORK
Attorney for Defendants
100 Church Street
New York, New York 10007
(212) 356-3523

By: /s/
Brachah Goykadosh
Assistant Corporation Counsel
Special Federal Litigation Division

cc: All counsel of record (by ECF only)

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RUMBLE, POLICE OFFICER FELIX SCHMIDT, DEPUTY
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**DECLARATION OF BRACHAH GOYKADOSH IN SUPPORT
OF DEFENDANTS' MOTIONS *IN LIMINE***

ZACHARY W. CARTER

Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street
New York, New York 10007

Of Counsel: Brachah Goykadosh
Tel: (212) 356-3523

Due and timely service is hereby admitted.

New York, New York....., 2018...

..... Esq.

Attorney for.....